

TJE/LCC/wsv 12/9/20

FILED  
LORAIN COUNTY  
2020 DEC 16 P 3:41  
COURT OF COMMON PLEAS  
TOM ORLANDO

IN THE COURT OF COMMON PLEAS  
LORAIN COUNTY, OHIO

20 CV 202377

LISA HARRIS  
afka LISA JETER  
1720 W. 44<sup>th</sup> Street  
Lorain, OH 44053

and

MICHAEL HARRIS  
1720 W. 44<sup>th</sup> Street  
Lorain, OH 44053

PLAINTIFFS

-vs-

RED LOBSTER RESTAURANT  
6935 Midway Mall  
Elyria, OH 44035

and

RED LOBSTER MANAGEMENT LLC  
1000 Darden Center Drive  
Orlando, FL 32837

and

CASE NO:

JUDGE CHRISTOPHER ROTHGERY

JUDGE:

COMPLAINT

(Trial by Jury Demanded Hereon)



RED LOBSTER MANAGEMENT LLC )  
adba RED LOBSTER HOSPITALITY LLC )  
c/o Corporate Creations Network Inc., )  
Statutory Agent )  
119 E. Court Street )  
Cincinnati, OH 45202 )  
and )  
JOHN DOE OR JANE DOE EMPLOYEE )  
(Name and Address Unknown) )  
and )  
JOHN DOE MAINTENANCE COMPANY )  
(Name and Address Unknown) )  
And )  
JOHN DOE PROPERTY OWNER )  
(Name and Address Unknown) )  
DEFENDANTS )

COUNT I

Now comes the plaintiff, Lisa Harris, and for her claim for relief says the following:

1. On or about December 27, 2018, at approximately 3:00 P.M., plaintiff Lisa Harris was a business invitee at the Red Lobster Restaurant located at 6935 Midway Mall, Elyria, Ohio 44035. She came out of the restaurant and walked to her sister's car that was parked in a handicapped parking space. She went around and was getting into the front passenger side of the car when she was caused to slip and fall on an unnatural accumulation of ice that was outside her door, causing injury to her person.

2. Plaintiff states that said parking lot is owned and/or managed and/or maintained, either jointly and/or severally, by defendant, Red Lobster Restaurant and/or Red Lobster Management LLC and/or Red Lobster Hospitality LLC and/or John Doe or Jane Doe Employee and/or John Doe Maintenance Company and/or John Doe Property Owner (whose names and addresses are unknown to plaintiffs but well known to the defendants, Red Lobster Restaurant and/or Red Lobster Management LLC and/or Red Lobster Hospitality LLC) were responsible for the maintenance of said parking lot, including removal of ice, and keeping it in a safe condition for its customers.

3. Plaintiff further states that defendants knew or should have known of the hazardous condition and failed to properly maintain the parking lot in a safe condition and/or post a warning sign for customers.

4. As a direct and proximate result of the joint and concurrent carelessness and negligence of the defendants, plaintiff slipped and fell injuring her right elbow, low back, right hip, suffered pain and limitation of motion, as well as other injuries, which plaintiff states may be permanent in nature. Plaintiff further states that she has incurred medical bills, to date, in the approximate amount of Seventeen Thousand Three Hundred Sixty-One Dollars (\$17,361.00), and that she may incur additional medical bills in the future.

5. Plaintiff further states that she suffered a loss of services and consortium with her husband for a period of time after the accident.

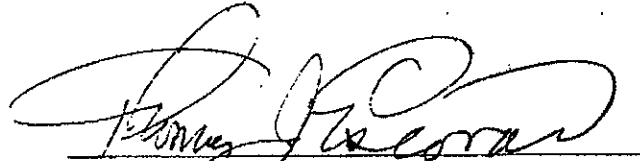
## COUNT II

Now comes plaintiff, Michael Harris, and for his claim for relief adopts and incorporates all the allegations and averments of Count I, as if fully rewritten and as they apply to his claim herein.

6. Plaintiff states that he is the husband of Lisa Harris, and that as a direct and proximate result of the joint and concurrent carelessness and negligence of the defendants, she incurred medical bills in the approximate amount of Seventeen Thousand Three Hundred Sixty-One Dollars (\$17,361.00), for which he may be responsible, and that she may incur additional medical bills and other related expenses in the future.

7. Plaintiff further states that he suffered a loss of services and consortium with his wife for a period of time after the accident.

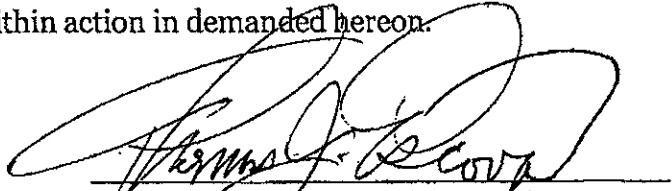
WHEREFORE, plaintiffs pray for a judgment against the Defendants, jointly and/or severally, under Count I in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), together with costs incurred herein; and under Count II in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), together with costs incurred herein.



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ATTORNEYS FOR THE PLAINTIFFS

JURY DEMAND

A trial by jury of the within action is demanded hereon.

A large, stylized handwritten signature in black ink, appearing to read 'Thomas J. Escovar', is written over a horizontal line.

THOMAS J. ESCOVAR (0011532)  
L. CHRISTOPHER COLEMAN (0075528)  
ATTORNEYS FOR THE PLAINTIFFS